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Before the
Federal Communications Commission
Washington, D.C. 20554
FCC Docket No. 93-119
General Docket No. 93-40

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JUN 14 1993

FCC - MAIL ROOM

In the Matter of

Allocation of the 219-220 MHz
Band for Use by the Amateur
Radio Service.

) FCC Docket No. 93-119
) General Docket No. 93-40

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June 12, 1993

FEDERAL COMMUNICATIONS
OFFICE OF THE SECRETARY

To: The Federal Communications Commission

COMMENTS OF THE PORTLAND AMATEUR RADIO CLUB

1 These comments are submitted by the Portland Amateur Radio Club (PARC). The Portland Amateur Radio Club is located in the metropolitan area of Portland, Oregon. The club is a major responder for the City of Portland, Oregon Office of Emergency Management, is affiliated with the Oregon Trail Chapter of the Red Cross Emergency Services, and supports numerous public service events with emergency communications, such as Artquake and the Portland Marathon.

2 **The Amateur Radio Service are good sharing partners**

PARC supports this allocation. The Amateur Radio Service (ARS) has demonstrated an excellent record of frequency sharing with other services. In addition local frequency coordinators have an excellent record of minimizing and controlling interference problems. As a member of the ORRC, the ORRC stands ready as a resource to insure harmonious sharing of the 219-220 MHz spectrum.

3 **Need is for point to point communications**

Within the ARS there is a great need for point to point communication such as is proposed in this docket. The loss of 220-222 MHz caused serious damage to the ARS. The proposed allocation of 219-220 on a shared basis provides some small measure of compensation for that loss of capability.

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4 **Point to point requirements provide protection**

We note that limiting secondary use by the ARS to coordinated point to point operation will provide significant protection to the Automated Maritime Telecommunications Systems (AMTS). PARC supports this requirement as a reasonable means to provide protection to the primary user of the band.

5 **Protection of Broadcast TV channel 13**

Unlike other services, where the operators are unfamiliar with the technical characteristics of transmission equipment, ARS operators are technically sophisticated. Operators in the ARS have extensive experience with operation on frequencies close to TV Broadcast channels. Operation on the 50 MHz ARS band has largely not caused problems with the adjacent broadcast channel 2. ARS operators are aware of, and employ the use of various technical methods to reduce or eliminate this problem.

6 **Appropriate types of modulation**

In this proceeding the Commission invited comment upon the modulation types to be allowed. PARC believes that, within limits, the restriction of modulation types is not warranted to control interference. Clearly the use of pulse, or other ultra wide band modes is inappropriate in the proposed band. However the spectrum characteristics of digital and voice modulation types are virtually identical with regard to interference potential. We therefor believe that special restrictions differentiating between digital and analog techniques are not warranted.

7 **Local coordinators dedicated to prevent interference on 219-220 MHz**

Coordination to prevent interference is the fundamental purpose of ARS frequency coordinators. We can therefor state that all ARS frequency coordinators are ready and willing to assist the AMTS service when a local contact to prevent or eliminate interference is required. Local frequency coordinators are experienced in the propagation characteristics, coverage area and protection requirements in the various geographical areas of the country. With the assistance of local frequency coordinators, the potential for interference will be non-existent.

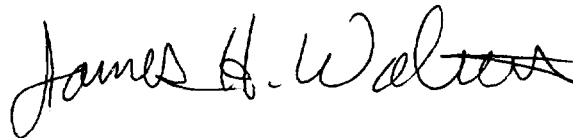
8 **Single point of contact**

We note that the AMTS has requested a single point of contact which would be responsible for protection of proprietary coordination information possessed by the AMTS service. ARS coordinators have similar requirements, we understand and concur with the desire to protect confidential information.

9 **Mechanisms to utilize local coordinator resources are in place and functioning**

As part of a program to support frequency coordinator participation at a regional level, the ARRL some time ago established an 800 number Bulletin Board System for frequency coordinator use. The system has built in mechanisms to protect frequency coordination information. This existing system is in place, functioning and is able to provide rapid communications between the local frequency coordinators and ARRL. ARS requests for coordination can be processed in an expeditious manner, while providing protection for the primary user of the band. The system will facilitate the utilization of local coordination resources to insure protection of the primary AMTS users of the 219-220 band.

Respectfully submitted,
The Portland Amateur Radio Club

A handwritten signature in black ink, reading "James H. Walters". The signature is written in a cursive style with a long horizontal stroke at the end.

By
James H Walters, WB7AAK
Chair, PARC Legal Affairs Committee